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**Statement of John A. Vincent
On Behalf of GPU Nuclear, Inc. and the Private Fuel Storage L.L.C.
Before the USDOE Hearing on the
Yucca Mountain Draft Environmental Impact Statement
Salt Lake City, Utah
January 13, 2000**

Good afternoon. My name is John Vincent and I am a Senior Engineer, Nuclear Fuel at GPU Nuclear and the Technology Committee Chairman for the Private Fuel Storage L.L.C. (PFS).

This afternoon I will provide some brief comments on DOE's Draft Environmental Impact Statement (DEIS) for the Yucca Mountain repository project. In particular, I will focus my comments on the transportation aspects of the DEIS.

1 I believe that the DOE DEIS provides a comprehensive evaluation of the environmental impacts associated with the construction and operation of the proposed Yucca Mountain repository. Specifically, it is clear that the proposed facility can be constructed and operated to adequately provide for the protection of the public health and safety. Additionally, it serves to underscore the need for such a facility and that there are clear and convincing benefits to the construction of a central repository as opposed to the distributed long-term storage of commercial spent nuclear fuel among many sites.

3... ^{relevant} Since the Private Fuel Storage project will transport its customers spent nuclear fuel to the storage facility by rail, the conclusions reached by DOE in the DEIS concerning transportation are ~~important~~ to the PFS project. For the last fifteen or so years, I have been actively supporting the ability of the nuclear industry to safely transport spent nuclear fuel. And the conclusions of the DEIS serve to re-enforce the fact that spent nuclear fuel has and can be transported safely and efficiently.

2 There has been ample historical evidence that safe, routine transportation of spent nuclear fuel can be accomplished. For more than three decades, the domestic nuclear industry has conducted almost three thousand shipments of spent nuclear fuel without a release of radioactive material or a failure of the transport cask. This is a remarkable safety record. I believe this is not the result of chance, but the result of a comprehensive federal regulatory regime of cask design criteria and certification regulation, and transportation regulation, and the conscious effort of the nuclear industry. The DEIS evaluation of the environmental impacts of transportation emphasizes that the risks associated with the transportation of spent fuel are extremely small. Or put another way, that the existing regulations provide an effective program for the protection of public health and safety. Spent nuclear fuel transportation has been done before, both here and abroad, and that very substantial experience provides a valuable base for the safe conduct of these activities in the future.

3 cont.

As I mentioned before, the conclusions of the DEIS with regard to transportation ~~are~~ ^{have} ~~important~~ ^{relevance} to the PFS project which is currently in the licensing process with the Nuclear Regulatory Commission. While the transportation of spent nuclear fuel to the PFS project from our customers is the subject of a separate NRC licensing process, any future shipments to the repository from the PFS facility would be bounded by the evaluations of this DEIS.

On behalf of GPU Nuclear and the Private Fuel Storage L.L.C. I would like to thank you for the this opportunity to comment on the Department of Energy's Draft Environmental Impact Statement for Yucca Mountain.